

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

BANILLA GAMES, INC. and GROVER  
GAMING, INC.,

Plaintiffs,

v.

GUANGZHOU YINGFENG TECHNOLOGY  
CO., LTD.,

Defendant.

Civil Action No. 3:23-cv-00182-RCY

**PLAINTIFFS' REQUEST FOR ENTRY OF DEFAULT**

To: Clerk of Court

Plaintiffs, Banilla Games, Inc. ("**Banilla**") and Grover Gaming, Inc. ("**Grover**"), by counsel, request the Clerk's entry of default as to the Defendant, Guangzhou Yingfeng Technology Co., Ltd. ("**Yingfeng**" or "**Defendant**"), pursuant to Fed. R. Civ. P. 55(a) for failure to file an answer or motion in this action within the time allowed by law. An Affidavit in support of this request is attached hereto as Exhibit 1.

Dated: June 2, 2023

BANILLA GAMES, INC.  
and  
GROVER GAMING, INC.

/s/ Stephen M. Faraci, Sr.

Stephen M. Faraci, Sr., Esquire (VSB No. 42748)

Robert N. Drewry, Esquire (VSB No. 91282)

WHITEFORD, TAYLOR & PRESTON, LLP

1021 E. Cary Street, Suite 1700

Richmond, Virginia 23219

Telephone: (804) 977-3307

Facsimile: (804) 977-3298

E-Mail: sfaraci@whitefordlaw.com

E-Mail: rdrewry@whitefordlaw.com

Robert Wm. Best, Esquire (VSB No. 72077)

WHITEFORD, TAYLOR & PRESTON, LLP

249 Central Park Avenue, Suite 300

Virginia Beach, Virginia 23462

Telephone: (757) 271-9752

Facsimile: (757) 271-9737

E-Mail: rbest@whitefordlaw.com

*Counsel for Plaintiffs, Banilla Games, Inc. and  
Grover Gaming, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2023, I electronically filed this *Request for Entry of Default* with the Clerk of the Court using the CM/ECF system. I also hereby certify that I have served a copy of the foregoing by United States Mail, First Class International, Postage Prepaid, to the following:

Guangzhou Yingfeng Technology Co., Ltd.  
A2, No. 822 Panyu Avenue North, Panyu District  
Guangzhou, Guangdong, China

/s/ Stephen M. Faraci, Sr.

Counsel